

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

AVKO EDUCATIONAL RESEARCH
FOUNDATION, a Michigan
Corporation, and DONALD J.
MCCABE, author,

Plaintiffs,

v.

THOMAS A. MORROW, an individual,
WAVE 3 LEARNING, INC.;
HOME SCHOOL HOLDINGS, INC.,
and HOME SCHOOL, INC;

Defendants.

Case No.: 1:11-cv-13381-TLL-CEB
Honorable Thomas L. Ludington
Magistrate Charles E. Binder

SUSAN PAYNE WOODROW (P29844)
Sigurd Hepler (P70383)
SUSAN PAYNE WOODROW JD, PC
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REQUEST FOR ENTRY OF DEFAULT

In accordance with Fed. R. Civ. P. 55(a), I request that a Clerk's Entry of Default be entered against Plaintiffs, AVKO Educational Research Foundation and Donald J. McCabe, for failure to plead or otherwise defend.

AFFIDAVIT

In support of my request for Clerk's Entry of Default, I state that:

1. The *DEFENDANTS' THOMAS A. MORROW AND WAVE 3 LEARNING, INC. ANSWER TO PLAINTIFFS' COMPLAINT AND COUNTERCLAIMS AND DEMAND FOR JURY* were filed with the court and served electronically on Plaintiff's counsel via ECF on August 26, 2011.
2. The plaintiffs have failed to plead or otherwise defend in accordance with Fed. R. Civ. P. 12.
3. The plaintiffs are not infants, incompetent persons or a members of the military service.
4. This statement is true and is signed under the penalty of perjury.

TRAVERSE LEGAL PLC

Date: September 21, 2011

By: /s/ Mark G. Clark _____
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(231) 932-0411
Mark@traverselegal.com

CERTIFICATE OF SERVICE

Documents:

- Request for Entry of Default

I hereby certify that on September 21, 2011 the referenced document was electronically filed with the court and served via ECF upon:

SUSAN PAYNE WOODROW
Attorney for Plaintiff

and via US Mail upon:

Home School Holdings, Inc.
1153 So. Lee Street, Suite 198
Des Plaines, IL 60016

Home School, Inc.
1153 So. Lee Street, Suite 198
Des Plaines, IL 60016

/s/ Mark G. Clark
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